



Phase 2

**EPPING FOREST DISTRICT COUNCIL:
Examination of the District Local Plan 2011 – 2033**

Examination Statement:

**MATTER 5: Site Selection Methodology and
the Viability of Site Allocations**

On Behalf of

Mr I Bennett

February 2019

Our Ref: C16133

Phase 2 PLANNING & DEVELOPMENT LIMITED

1. Introduction

- 1.1 The following Examination Written Statement has been prepared on behalf of our client Mr I Bennett, who owns land at Mill House Farm, at Bell Common just south of Epping. He has made representations to the Submission draft of the Local Plan, promoting the land for over 55s housing.
- 1.2 This Statement does not duplicate those representations, but addresses where relevant the issues raised by the Inspector in her Matters, Issues and Questions relating to Matter 5, Site Selection Methodology and the Viability of Site Allocations, and solely in response to Issue 1.

Issue 1: Have the Plan's housing allocations been chosen on the basis of a robust assessment process?

- 1.3 Firstly to clarify in respect of Matter 1 and discussions at the Examination on this point, our client has not been invited to a meeting to explore the Council's reasoning for the omission of his site, and the site has not been included within the Site Selection Assessment, despite representations to both the Reg 18 and 19 draft Plans, and an earlier planning application, which was refused on the basis that the site should be promoted through the emerging Local Plan.
- 1.4 With regards to point 1 of Issue 1, clearly we await the Council's response to this in their Statement and at the Examination. However, it is clear that policy SP2 sets out a strategy which does not rely on the scale or sustainability of settlement types, but instead a reliance on a sequence of locations dictated by flood risk, open spaces, brownfield land, Green Belt etc. and is thus a constraint led approach, rather than one which is based on locational housing need or wider sustainability factors, including an assessment of the benefits that some sites could bring which could outweigh some of the constraints, and it is not clear how any such benefits were assessed, if at all.
- 1.5 Our client has concerns over the order of the factors within the sequential approach, for example the identification of previously developed land in the Green Belt and greenbelt/green field land on the edge of settlements below the use of urban open spaces. This has generated considerable objection within those settlements affected by the loss of valued open spaces, which are clearly more sensitive than the loss of brownfield sites within the Green Belt and sites which adjoin urban areas. Our client's land as set out in our Reg 19 representation comprises previously developed land and the Inspector is referred to those representations.
- 1.6 In this regard the Council's response to the Inspector's point 4 within Issue 1 is awaited.